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*Counsel for Defendants, Red Apple  
Fireworks Co., LTD and 1.4G Holdings, LLC.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JIANGXI PANDA FIREWORKS CO., LTD.,  
a Chinese entity,

Plaintiff(s),

vs.

DOUGLAS BURDA, an individual;  
KONCEPT LLC, a Nevada limited liability  
company doing business as BURDA IP;  
ELISSA BURDA, an individual; RED APPLE  
FIREWORKS CO., LTD., a Nevada limited  
liability company; 1.4G HOLDINGS, LLC, a  
Nevada limited liability company.

Defendant(s).

CASE NO. 2:23-cv-01232-MMD-DJA

**STIPULATION AND ~~[PROPOSED]~~  
ORDER STAYING DEADLINES  
PENDING FINALIZATION OF  
SETTLEMENT**

**[EIGHTH REQUEST]**

**[ECF NO. 107]**

Plaintiff Jiangxi Panda Fireworks Co. Ltd. (“Plaintiff”) and remaining Defendants 1.4G Holdings, LLC and Red Apple Fireworks Co. Ltd. (“Defendants”), by and through their respective counsel of record, pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, hereby file this status report pursuant to ECF No. 107, and hereby stipulate and agree that all pending deadlines in this matter be stayed for sixty (60) additional days so that the parties may continue to finalize and execute their formal written agreement.

1 The parties have made significant progress in reducing their settlement agreement to a  
2 final writing; however, additional time is necessary to execute the document (especially given  
3 that one party is located overseas), effectuate certain settlement obligations, and coordinate with  
4 third parties involved in the broader dispute but who are not parties to this Nevada litigation.  
5 This is the eighth request to stay or extend discovery deadlines over the course of this litigation.

6 The parties will file a stipulated dismissal of all claims once their settlement agreement is  
7 finalized and executed, or a status report in sixty (60) days if such dismissal has not occurred.

8 **IT IS SO STIPULATED.**

9 DATED this 30th day of June, 2025.

DATED this 30th day of June, 2025.

10 **GREENBERG TRAURIG, LLP**

**BAYRAMOGLU LAW OFFICES LLC**

11 /s/ Bethany L. Rabe

/s/ David Silver

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17  
18  
19 **IT IS SO ORDERED.**

20   
21 DANIEL J. ALBREGTS  
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: 7/1/2025  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2025, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive such service.

By: /s/ Chris Darling

Chris Darling

An employee of GREENBERG TRAURIG, LLP